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September 30, 2020

By ECF

Honorable Mary K. Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Amy-Jo Sabo v. City of New York
Docket No.: 19-Civ-2681 (MKV)

Dear Judge Vyskocil:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel for the City of New York, attorney Defendant City of New York in the above-referenced action. On consent of the parties, we respectfully request an extension of time for the parties to file any Pre-Motion Letters (and Local Rule 56.1 Statements) from October 1, 2020 to October 8, 2020 and an extension of time for the parties to file any Response Letters (and Local Rule 56.1 Counter-Statements) from October 5, 2020 to October 15, 2020.

The parties are requesting this extension of time because the parties are currently engaging in serious settlement negotiations. As such, it would be advantageous for both parties to have additional time to continue settlement negotiations and potentially avoid incurring expenses associated with the aforementioned motion-related papers.

The parties thank the Court for its consideration of this request.

The Court previously indicated it would not extend the deadlines for the Parties' submissions. Moreover, this request is untimely because it was not submitted 72 hours in advance of the deadline, as required by the Court's Individual Practices. As a result, the request is GRANTED IN PART. Pre-Motion Letters (and Local Rule 56.1 Statements) must be submitted by October 2, 2020 and Response Letters (and Local Rule 56.1 Counterstatements) must be submitted by October 6, 2020.

Date: 10/1/2020
New York, New York

A handwritten signature in black ink that reads "Mary Kay Vyskocil".
Mary Kay Vyskocil
United States District Judge

Respectfully submitted,

/s/ Timothy A. Gumaer

Timothy A. Gumaer
Assistant Corporation Counsel

-and-

/s/ Jesse S. Weinstein

Jesse S. Weinstein
Phillips & Associates, PLLC